



Office of
AGRICULTURAL COMMISSIONER

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Agricultural
Commissioner
Henry S. Gonzales

Chief Deputy
Susan L. Johnson

April 18, 2011

Mr. Chris Reardon
Chief Deputy Director
Department of Pesticide Regulation
1001 I Street, P.O. Box 4015
Sacramento, California 95812-4015

Dear Mr. Reardon:

We have received your letter inquiring what method the Ventura County Agricultural Commissioner will use to establish a system to maintain a running total of VOC emissions for every field fumigation that occurs in Ventura County between the months of May and October in order to assure that the fumigation limit of 2.86 average tons/day established by your agency will not be exceeded.

Since 2008 Ventura County growers have used approximately 50% of emission allowances established for each year. My office does not see any indication that the current year will establish a different pattern. Therefore we feel confident that we can track grower use of fumigants between May and October by implementing the **"Track and Stop" method. We will not require each grower to apply for an individual emission allowance, which would require us to track each grower's allowance separately. We will use the VOC tracker developed by your agency to monitor information from NOIs and PURs. If we begin to approach a level close to the emission allowance we deny or stop all fumigations.**

Sincerely:

Henry Gonzales
Agricultural Commissioner